

WWR Ref. No. 06562552

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS (Eastern Division)**

ADVANCE PAYROLL FUNDING, LTD.,)	CASE NO. 08 C 1072
)	
Plaintiff,)	
)	
vs.)	JUDGE MILTON I. SHADUR
)	MAG. JUDGE ARLANDER KEYS
DURACO PRODUCTS, INC., etc.)	
)	
Defendant.)	

**PLAINTIFF'S MOTION TO ENFORCE SETTLEMENT
AGREEMENT AND ENTER STIPULATED JUDGMENT**

Now comes Plaintiff Advance Payroll Funding, Ltd., and hereby moves the Court to enforce the Settlement Agreement between Plaintiff and Defendant Duraco Products, Inc. dba Duraco Plastics; and for default of the agreement to enter the Stipulated Judgment for a sum that reflects all credits due. The Settlement Agreement, an affidavit of Plaintiff's Representative and a proposed Order reflecting the correct amount of the Final Judgment are attached hereto and incorporated herein by reference.

Respectfully submitted,

WELTMAN, WEINBERG & REIS CO., L.P.A.

/s/ Robert T. Kuehl

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Respectfully submitted,

WELTMAN, WEINBERG & REIS CO., L.P.A.

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Pro Hac Vice/Lead Counsel for Plaintiff
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ADVANCE PAYROLL FUNDING, LTD.,) CASE NO. 08 C 1072
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Plaintiff,)
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vs.) JUDGE MILTON I. SHADUR
) MAG. JUDGE ARLANDER KEYS
DURACO PRODUCTS, INC., etc.)
)
Defendant.)

**PROOF OF SERVICE OF
PLAINTIFF'S MOTION TO ENFORCE SETTLEMENT AGREEMENT
AND ENTER STIPULATED JUDGMENT**

I, Robert T. Kuehl, certify as follows under penalty of perjury this 24th day of June, 2008.

1. I filed *Plaintiff's Motion to Enforce Settlement Agreement and Enter Stipulated Judgment*, Plaintiff's Notice of Motion, Plaintiff's Notice of Presentment of Motion, and Plaintiff's Proposed Judgment and Order, by filing it with the clerk of court by electronic means.

2. I further caused copies of *Plaintiff's Motion to Enforce Settlement Agreement and Enter Stipulated Judgment*, Plaintiff's Notice of Motion, Plaintiff's Notice

of Presentment of Motion, and Plaintiff's Proposed Judgment and Order, to be served by regular mail, pursuant to Loc.R. 5.3(a)(2) and Fed.R.Civ.P. 5(b)(2)(C), to DURACO PRODUCTS, INC., dba DURACO PLASTICS, c/o agent C T Corporation System, at the agent's last known address of 208 S. LaSalle Street, Suite 814, Chicago, IL 60604.

3. I further caused copies of *Plaintiff's Motion to Enforce Settlement Agreement and Enter Stipulated Judgment*, Plaintiff's Notice of Motion, Plaintiff's Notice of Presentment of Motion, and Plaintiff's Proposed Judgment and Order, to be served by regular mail, pursuant to Loc.R. 5.3(a)(2) and Fed.R.Civ.P. 5(b)(2)(C), to DURACO PRODUCTS, INC., dba DURACO PLASTICS, at its last known address of 1109 East Lake Street, Streamwood, IL 60107-4395.

Respectfully submitted,

WELTMAN, WEINBERG & REIS CO., L.P.A.

/s/ J. Charles Ruiz-BUeno
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